

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Defining Primary Lines

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CC Docket No.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF U S WEST COMMUNICATIONS, INC.

U S WEST Communications, Inc. ("U S WEST") hereby submits these comments in support of the Petitions for Reconsideration ("PFR") of the Federal Communications Commission's ("Commission") Report and Order in the above-referenced docket.¹ In particular, U S WEST agrees that the Commission should reconsider that portion of its Report and Order applying a location-based definition of primary lines to college and university dormitory rooms.

U S WEST generally supports the Commission's decision to adopt a location-based definition for classifying a telephone line as either primary or non-primary. As applied to the unique circumstances of students residing in college and university dormitories, however, strict application of the location-based definition will impose a significant administrative burden on colleges and universities that provide local telephone service to dormitory residents. To

¹ In the Matter of Defining Primary Lines, CC Docket No. 97-181, Report and Order & Further Notice of Proposed Rulemaking, FCC 99-28, rel. Mar. 10, 1999. PFRs filed May 5, 1999. U S WEST files these comments in support of the PFRs filed by Moultrie Independent Telephone Company ("Moultrie"), Brown University ("Brown") and the Association for Telecommunications Professionals in Higher Education ("ACUTA").

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avoid this quagmire, the Commission should recognize a limited exception to its location-based primary line definition and specify that all telephone lines used to provide service to student dormitory rooms are primary lines.

In its Report and Order, the Commission reasonably concluded that a location-based primary line definition is the least intrusive and most administratively feasible definition because it can be implemented by local exchange carriers based on their service records.² But that conclusion does not hold true in the limited circumstance where a multi-occupant dormitory room is served by multiple telephone lines. Specifically, a number of large universities purchase Centrex service from U S WEST pursuant to a master billing account and, in turn, provide local telephone service to student dormitory rooms.³ Under these arrangements, U S WEST has no billing relationship at all with the dormitory residents⁴ and thus has no billing records that could be used to identify the address of the resident or which line should be classified as primary.

The petitioners correctly point out the administrative problems associated with giving primary line treatment to only one telephone line per dormitory room. In order to comply with the Commission's location-based primary line rule, those universities that purchase Centrex service will be

² Report and Order ¶¶ 14-15.

³ It is U S WEST's understanding that these students typically are allowed to make local telephone calls without a separate charge from their overall dormitory fees. See Brown PFR at 3.

⁴ See id. at 2-3.

forced to implement an arbitrary and administratively burdensome process for determining which student in a multi-occupant dormitory room will receive the benefit of primary line treatment. There simply is no fair or accurate way for them to classify the sole primary line in a dormitory room, given the high churn rate of dormitory room residents and the often-mandatory assignment of dormitory living arrangements.⁵ Thus, rather than reducing the administrative burden on colleges and universities, the application of the Commission's location-based primary line definition to dormitory rooms greatly increases the complexity of their billing arrangements.

Finally, the Commission's recognition of a limited exception for dormitory rooms is consistent with the underlying purpose of its location-based definition of primary lines. Such an exception would not involve any intrusive investigation into private living arrangements because dormitory living arrangements almost always involve occupancy by unrelated students. In addition, there is no danger of misreporting, since all telephone lines used to provide service to dormitory rooms would be classified as primary lines. In short, an exception for dormitory rooms would be narrowly defined and easy to administer.

⁵ ACUTA PFR at 2-5.

For these reasons, the Commission should reconsider its decision to apply its location-based definition of primary lines to lines serving college and university dormitory rooms.

Respectfully submitted,

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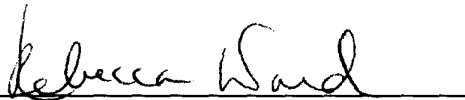
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June 23, 1999

CERTIFICATE OF SERVICE

I, Rebecca Ward, do hereby certify that on the 23rd day of June, 1999, I have caused a copy of the foregoing **COMMENTS OF U S WEST COMMUNICATIONS, INC.** to be served, via first class United States Mail, postage prepaid, upon the persons listed on the attached service list.


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